

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

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In re:

The Diocese of Buffalo, New York

Debtor.

Case No. 20-10322 (CLB)

Chapter 11

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**NOTICE OF FILING**

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**PLEASE TAKE NOTICE** that, in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [Docket No. 362], Burns Bair LLP has filed the *Monthly Fee Statement of Burns Bair LLP for Compensation for Services Rendered and Reimbursement of Expenses as Special Insurance Counsel to the Official Committee of Unsecured Creditors of the Diocese of Buffalo, New York, for the Period October 1, 2024 through October 31, 2024*, a copy of which is attached hereto and hereby served upon you.

Dated: November 21, 2024

**BURNS BAIR LLP**

/s/ Jesse J. Bair

Jesse J. Bair (admitted *pro hac vice*)

Timothy W. Burns (admitted *pro hac vice*)

10 E. Doty St., Suite 600

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*Special Insurance Counsel to the Official Committee of  
Unsecured Creditors of the Diocese of Buffalo, New York*

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

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In re:

The Diocese of Buffalo, New York

Debtor.

Case No. 20-10322 (CLB)

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**MONTHLY FEE STATEMENT OF BURNS BAIR LLP FOR COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL  
INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF THE DIOCESE OF BUFFALO, NEW YORK, FOR THE PERIOD  
OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

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Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors of the Diocese of Buffalo, New York</u>
Date of Retention:	<u>Effective October 5, 2023, pursuant to Order entered November 13, 2023 [Docket No. 2606]</u>
Period for which compensation and reimbursement is sought:	<u>October 1, 2024 through October 31, 2024</u>
Amount of compensation sought as actual, reasonable, and necessary:	<u>80% of \$16,212.00 (\$12,969.60)</u>
Amount of expense reimbursement sought as actual, reasonable, and necessary:	<u>\$4.38</u>

This is a: X monthly \_\_\_ quarterly \_\_\_ final application.

This is Burns Bair LLP's twelfth monthly fee statement in this case.

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
the Diocese of Buffalo**

**Issue Date :** 11/20/2024

**Bill # :** 01593

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/2/2024	Jesse Bair	Correspond with B. Cawley re lift stay hearing and associated insurance project (.1);	0.10	\$70.00
10/2/2024	Brian Cawley	Correspond with J. Bair re lift stay hearing and briefing projects in connection with same (.1);	0.10	\$55.00
10/3/2024	Brian Cawley	Finish drafting exhaustion/erosion argument section for reply in support of lift stay motion (3.2);	3.20	\$1,760.00
10/4/2024	Alexander Castro	Review recent materials and update memo re Chubb unfair claims handling practices (.6);	0.60	\$282.00
10/6/2024	Jesse Bair	Brief review re the debtor's lift stay objection (.2); brief review re B. Cawley's insurance insert for potential reply to same (.1);	0.30	\$210.00
10/7/2024	Brian Cawley	Review instructions re additional project related to motion to lift stay (.2); draft section re particular duty to defend issues in support of motion to lift stay (1.1);	1.30	\$715.00
10/7/2024	Timothy Burns	Review motion for relief from stay discovery served by Diocese (.2);	0.20	\$140.00
10/7/2024	Jesse Bair	Detailed review re the debtor's lift stay opposition (.6);	0.60	\$420.00
10/7/2024	Jesse Bair	Participate in additional call with I. Scharf re Section 349 appellate decision and potential Rule 2004 insurance discovery (.3);	0.30	\$210.00
10/7/2024	Jesse Bair	Participate in call with I. Scharf re Committee reply to the debtor's opposition to the lift stay motion (.2);	0.20	\$140.00
10/7/2024	Jesse Bair	Provide instructions to B. Cawley re drafting insurance portions of the Committee's reply to the debtor's lift stay opposition (.3); review and edit the insurance sections of the Committee's lift stay reply, including related legal research (.5);	0.80	\$560.00

10/8/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re lift stay issues (.5);	0.50	\$350.00
10/9/2024	Jesse Bair	Review the Committee's reply to the debtor's lift stay opposition (.2);	0.20	\$140.00
10/9/2024	Jesse Bair	Review correspondence re lift stay hearing preparations (.1);	0.10	\$70.00
10/9/2024	Timothy Burns	Review and revise opposition to discovery stay (.2);	0.20	\$140.00
10/9/2024	Timothy Burns	Participate in call with state court counsel re CNA's Rule 2019 motion (.1);	0.10	\$70.00
10/10/2024	Brian Cawley	Attend hearing on motions to lift stay for insurance purposes (5.5);	5.50	\$3,025.00
10/10/2024	Brian Cawley	Draft memo re outcome of motion to lift stay hearing and related case insurance issues (1.8);	1.80	\$990.00
10/10/2024	Brian Cawley	Participate in conference with J. Bair re lift stay hearing outcome (.2);	0.20	\$110.00
10/10/2024	Jesse Bair	Participate in conference with B. Cawley re lift stay hearing outcome (.2); review B. Cawley memo re same (.2);	0.40	\$280.00
10/11/2024	Jesse Bair	Review text orders re outcome of lift stay hearing (.1);	0.10	\$70.00
10/11/2024	Brian Cawley	Draft supplemental memo re actions items from lift stay hearing (.5);	0.50	\$275.00
10/12/2024	Timothy Burns	Participate in conference with J. Bair re case status, developments, and related insurance projects (.1);	0.10	\$70.00
10/12/2024	Jesse Bair	Participate in conference with T. Burns re case status, developments, and related insurance projects (.1);	0.10	\$70.00
10/13/2024	Timothy Burns	Review correspondence with Committee professionals, the Committee, and state court counsel re preliminary injunction and motion to lift stay (.2); review correspondence with Committee professionals re mediation issues (.2);	0.40	\$280.00
10/14/2024	Timothy Burns	Review Judge Chimes orders re Parish hearing (.1); participate in call with I. Scharf re CNA Rule 2019 filings (.1);	0.20	\$140.00
10/14/2024	Jesse Bair	Correspond with B. Cawley re upcoming hearing re parish litigation moving forward (.1);	0.10	\$70.00
10/15/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation and litigation strategy (.4);	0.40	\$280.00
10/15/2024	Timothy Burns	Review I. Scharf correspondence with state court counsel re case developments (.1);	0.10	\$70.00
10/16/2024	Timothy Burns	Review debtor correspondence to Court re appointment of mediators (.1);	0.10	\$70.00
10/16/2024	Jesse Bair	Review the debtor's letter to the Court re appointment of mediators (.1);	0.10	\$70.00

10/17/2024	Jesse Bair	Review CNA letter to Court re Rule 2019 motion and lift stay decision (.1);	0.10	\$70.00
10/21/2024	Timothy Burns	Participate in BB team meeting re lift stay issues and insurance strategy re upcoming mediations (.1);	0.10	\$70.00
10/21/2024	Timothy Burns	Review Wausau letter to court re appointment of mediator (.1);	0.10	\$70.00
10/21/2024	Jesse Bair	Participate in BB team meeting re lift stay issues and insurance strategy re upcoming mediations (.1);	0.10	\$70.00
10/21/2024	Brian Cawley	Participate in BB team meeting re lift stay issues and insurance strategy re upcoming mediations (.1);	0.10	\$55.00
10/22/2024	Jesse Bair	Review debtor correspondence and correspond with B. Horn-Edwards re drafting second interim fee application (.1);	0.10	\$70.00
10/23/2024	Jesse Bair	Participate in call with T. Burns re activating insurance adversary proceeding (.1);	0.10	\$70.00
10/23/2024	Brenda Horn-Edwards	Draft Burns Bair second interim fee application and exhibits (1.3); correspond with J. Bair re same (.1);	1.40	\$420.00
10/23/2024	Timothy Burns	Participate in call with I. Scharf re insurance adversary and recent conversations with Debtor's counsel (.2); participate in call with J. Bair re same (.1);	0.30	\$210.00
10/24/2024	Brian Cawley	Draft summary re issues in connection with the insurers' letter re appointment of mediator (.4);	0.40	\$220.00
10/29/2024	Jesse Bair	Correspond with B. Cawley re upcoming case hearings (.1);	0.10	\$70.00
10/30/2024	Jesse Bair	Review B. Cawley memo re outcome of Rule 2019 hearing (.2);	0.20	\$140.00
10/30/2024	Timothy Burns	Review the Committee's Rule 2019 Response (.2); review the Debtor's Rule 2019 joinder (.1); review B. Cawley memo re outcome of October 30 hearing (.2);	0.50	\$350.00
10/30/2024	Brian Cawley	Attend status conference with Judge Chimes for insurance purpose re prosecution of parish claims (.7);	0.70	\$385.00
10/30/2024	Brian Cawley	Attend hearing on the Insurers' Rule 2019 motion for insurance purposes (2.8);	2.80	\$1,540.00
10/30/2024	Brian Cawley	Draft memo re outcome of Rule 2019 hearing (1.3);	1.30	\$715.00
10/31/2024	Brian Cawley	Draft memo re outcome of status conference with Judge Chimes re prosecution of parish claims (.5);	0.50	\$275.00
10/31/2024	Timothy Burns	Review B. Cawley memo re outcome of status conference before Judge Chimes (.1); review I. Scharf correspondence re mediation issues (.1);	0.20	\$140.00

10/31/2024	Jesse Bair	Review I. Scharf correspondence re case developments and agenda for state court counsel meeting (.1);	0.10	\$70.00
<b>Total Hours and Fees</b>			<b>28.10</b>	<b>\$16,212.00</b>

### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/1/2024	Postage	\$4.38
<b>Total Expenses</b>		<b>\$4.38</b>

### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	0.60	\$470.00	\$282.00
Brenda Horn-Edwards	Paralegal	1.40	\$300.00	\$420.00
Brian Cawley	Associate	18.40	\$550.00	\$10,120.00
Jesse Bair	Partner	5.10	\$700.00	\$3,570.00
Timothy Burns	Partner	2.60	\$700.00	\$1,820.00

**Total Due This Invoice: \$16,216.38**